

1 ASHLIE L. SURUR, ESQ.
Nevada Bar No. 11290
2 asurur@lawhjc.com

3 **HALL, JAFFE & CLAYTON, LLP**
7425 Peak Drive
4 Las Vegas, Nevada 89128
(702) 316-4111
5 Fax (702) 316-4114

6 *Attorneys for Castlegate*
Homeowners Association
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 WELLS FARGO BANK, N.A.; a national
banking association,

11 Plaintiff,

12 vs.

13 SATICOY BAY LLC, SERIES 1304
14 KINGDOM, a Nevada limited-liability
company, CASTLEGATE HOMEOWNERS
15 ASSOCIATION, a Nevada non-profit
corporation; LEACH JOHNSON SONG &
16 GRUCHOW, LTD., a Nevada limited-liability
company;

17 Defendants.
18

Case No.: 2:17-cv-01510-RFB-NJK

STIPULATION AND ORDER TO
EXTEND RENEWED MOTION
DEADLINE
(Third Request)

19 Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, the parties, by and through their
20 respective attorneys of record, stipulate as follows:

21 1. On August 23, 2018 the parties filed a Stipulation and Order to Extend Motion
22 Deadline pursuant to the court's July 13, 2018 Amended Order. ECF No. 56.

23 2. On August 27, 2018, the court issued a minute order granting in part and
24 denying in part the parties' Stipulation and Order to Extend Motion Deadline per July 13, 2018
25 Amended Order. ECF No. 57. The court granted an extension for all renewed motions to be
26 filed on or before September 24, 2018. *Id.*

27 3. The parties requested and obtained an extension to file all renewed motion to
28 October 24, 2018. ECF No. 62.

4. The parties are still actively engaging in settlement negotiations. The parties agree that extending the current deadline for filing renewed motions is necessary to the viability of these negotiations, particularly as it will conserve litigation costs and allow the parties to continue to focus their resources on settlement. Negotiations in this case require additional time, because the HOA must obtain approval from the HOA's Board for authority. Wells Fargo has presented a formal written settlement offer to the HOA, and it is currently under evaluation. The parties are working as quickly as possible and are not seeking this extension to unduly delay this action. This extension is made in good faith for the sole purpose of providing the parties the additional time they need to pursue settlement. This constitutes good cause to extend the renewed motion deadline by thirty (30) days or until November 23, 2018 and demonstrates excusable neglect for the timing of the submission of this stipulation.

5. Plaintiff settled its claims against Saticoy Bay on or about September 12, 2018 [ECF No. 59], so the only remaining parties with an interest in this requested relief are Plaintiff and the HOA.

Dated: October 24, 2018.

HALL, JAFFE & CLAYTON, LLP

By: /s/Ashlie L. Surur
Ashlie L. Surur, Esq.
Nevada Bar No.11290
7425 Peak Drive
Las Vegas, Nevada 89128
*Attorneys for Castlegate
Homeowners Association*

Dated: October 24, 2018.

SNELL & WILMER L.L.P.

By: /s/Tanya N. Lewis
 Robin E Perkins, Esq.
 Nevada Bar No. 9891
 Tanya N. Lewis, Esq.
 Nevada Bar No. 8855
 3883 Howard Hughes Parkway, Suite 1100
 Las Vegas, NV 89169
Attorneys for Wells Fargo Bank, N.A.

ORDER

IT IS SO ORDERED:

RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED this 25th day of October, 2018.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

STIPULATION AND ORDER TO EXTEND RENEWED MOTION DEADLINE

Tanya N. Lewis, Esq
Snell & Wilmer L.L.P.
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
Attorneys for Wells Fargo Bank, N.A.

Michael F. Bohn, Esq.
Adam R. Trippiedi, Esq.
LAW OFFICES OF MICHAEL F. BOHN, ESQ.
376 East Warm Springs Road, Ste. 140
Las Vegas, Nevada 89119
Attorneys for Saticoy Bay LLC, Series 1304 Kingdom

Alex Raleigh
An Employee of HALL JAFFE & CLAYTON, LLP